

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                  )  
    )  
v.    )         Criminal No. 05-10083-JLT  
    )  
DWAYNE THOMAS                              )

GOVERNMENT'S §5K1.1 DOWNWARD DEPARTURE  
MOTION BASED UPON SUBSTANTIAL ASSISTANCE

The United States hereby moves the Court, pursuant to U.S.S.G. §5K1.1, for a downward departure from the applicable sentencing guideline range for the sentencing of Defendant Dwayne Thomas, based upon the substantial assistance he provided to the government.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Adam Bookbinder  
ADAM J. BOOKBINDER  
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system, which will provide electronic notice to counsel as identified on the Notice of Electronic Filing.

/s/ Adam J. Bookbinder  
Adam J. Bookbinder

Dated: March 7, 2007